

EXHIBIT P

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES
 In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA EMAIL

August 3, 2017

Steven T. Cottreau, Esq.
 Jones Day
 51 Louisiana Avenue, N.W.
 Washington, D.C. 20001-2113

RE: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Steve:

I write to follow up on my letters dated June 2 and 8, 2017, presenting plaintiffs' final proposals concerning the list of names of individuals and entities to be searched in Dubai Islamic Bank's ("DIB") electronic account database. As you will recall, plaintiffs' letter proposals offered significant concessions by agreeing to remove 121 individuals and entities (and any associated aliases) from the original list of 500 produced to DIB on October 10, 2016. Despite plaintiffs' good faith attempts to reach a final agreement, including our offer to meet-and-confer on these issues, we have not heard from DIB since your June 8, 2017 correspondence proposing an extension of the document production deadline for DIB. Given the impending document production deadline of August 15, 2017, plaintiffs are concerned that DIB may not meet its obligation to conduct the searches as directed by Magistrate Judge Maas during the March 22, 2016 discovery conference. Please let us know DIB's position concerning the search term protocol and plaintiffs' proposals at your earliest convenience.

Additionally, plaintiffs await DIB's response to our previous requests for information regarding the status and/or findings of DIB's search for documentation relating to the 1998 U.S. Embassy bombings. *See* March 22, 2016 Transcript of Record at pp. 63-64 (Magistrate Judge Maas ordering DIB to "expand the search" for documentation relating to "investigations or other responses that the bank internally may have had in terms of checking whether it had troublesome accounts or relationships.").

Steven T. Cottreau, Esq.

August 3, 2017

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Sincerely,

COZEN O'CONNOR



By: J. Scott Tarbutton

cc: Members of Plaintiffs' Executive Committees

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